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               UNITED STATES DISTRICT COURT
              FOR THE DISTRICT OF NEW JERSEY
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          CIVIL ACTION: 2:24-CV-02096-JXN-ESX
3
      C.V.,
                        Plaintiff,
4
         vs.
5
      LAUREN CARMINUCCI,
6
                        Defendant.
7
8
         Remote Deposition of LAUREN CARMINUCCI taken
9 in the above-mentioned matter before Michelle
10 Gruendel, a Certified Court Reporter and Notary
11 Public of the State of New Jersey, taken remotely
12 via Zoom on February 14, 2025 commencing at 10:02
13 a.m.
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20
21
               ROSENBERG & ASSOCIATES, INC.
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        Certified Court Reporters & Videographers
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1 A P P E A R A N C E S: (VIA ZOOM) 2 DANIEL S. SZALKIEWICZ & ASSOCIATES, PC BY: DANIEL S. SZALKIEWICZ, ESQ. 3 23 West 73rd Street, Suite 102 New York, New York 10023 4 212-706-1007 E-MAIL: Daniel@lawdss.com 5 For the Plaintiff, C.V. 6 FUSCO & MACALUSO, LLC 7 BY: STEVEN BYOUN, ESQ. 150 Passaic Avenue 8 Passaic, New Jersey 07055 973-779-1163 9 E-MAIL: SByoun@fmnj-law.com For the Defendant, Lauren Carminucci 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	1 LAUREN CARMINUCCI, residing 111 Boulderwood Drive, 2 Bernardsville, New Jersey 07929, having been first 3 duly sworn according to law, testifies as follows: 4 THE COURT REPORTER: Please state and 5 spell your full name and provide your address. 6 THE WITNESS: Yes. Lauren Carminucci, 7 L-A-U-R-E-N, C-A-R-M-I-N-U-C-C-I. My address is 8 111 Boulderwood Drive, Bernardsville, New Jersey 9 07924. 10 DIRECT EXAMINATION BY MR. SZALKIEWICZ: 11 Q. Good morning, Mr Miss Carminucci. My 12 name is 13 A. Miss. 14 Q. Miss. 15 My name is Daniel Szalkiewicz. I represent 16 the plaintiff in this matter. We're here today for 17 your deposition. 18 Before we begin, I just want to go over some 19 ground rules, if that's okay. 20 You ready? 21 A. Sure. 22 Q. All right. So first, because we are not 23 having this recorded on video, the court reporter, 24 who you see on the screen, will be taking down 25 everything we are saying. If you respond, I need
INDEX WITNESS EXAMINATION BY PAGE LAUREN MR. 4 CARMINUCCI SZALKIEWICZ EXHIBITS NUMBER DESCRIPTION PAGE I First Request 17 for Production of Documents 2 Photograph 49 10 3 Group chat 50 4 Text messages 55 11 5 Photograph 72 6 Group text 87 12 chat 7 Screen shot of 93 13 message 8 Text message 109 14 9 Interrogatory 115 Responses 15 10 Intent to Sue 119 16 EXHIBITS RETAINED BY 17 COUNSEL	1 you to respond with a verbal yes or no rather than 2 nodding your head. 3 Do you understand? 4 A. Yes. 5 Q. On top of that, you're more than welcome to 6 take any breaks that you would like. The only 7 thing that I ask is if a question is pending, you 8 answer the question first and then you can go off 9 screen and take a break. 10 Okay? 11 A. Sure. 12 Q. I'm going to be sharing some exhibits with 13 you on the screen. If you have a problem seeing 14 them, let me know. As well as sharing them on the 15 screen, I will also e-mail them to your attorney 16 who can then forward them directly to you, if you 17 want to look at them that way. 18 Okay? 19 A. Sure. 20 Q. If I say something you don't understand, if 21 for some reason you can't hear me, please let me 22 know and I'll try to speak louder. If you don't 23 understand a question, I'll try to phrase it in a 24 way that you do. 25 Does that make sense?

34

1 that C.V. was saying to me and then -- I even said

2 Olivia, what video, send me it. She couldn't. She

3 never provided it to me. I think it was just

4 C.V.'s way of putting fear in Olivia, making this

5 up and then, you know, turning Olivia against me.

6 And then it -- like I said, it just -- I think

7 mostly because we were all afraid of C.V. Everyone

8 in that group feared C.V.

9 Q. But you haven't spoken to C.V. since May of

10 2023, correct?

11 A. I have not.

Q. She hasn't been part of your life now for a

13 year and a half?

14 A. No, but I know that she stalks me because,

15 you know, my ex-brother-in-law had told me that,

16 you know, she reached out to him the day she filed

17 just saying hey and he never answered her. He

18 doesn't want to be involved at all. He didn't ever

19 want to engage with her, but she's never met him so

20 I don't know why she would reach out to someone

21 that she's never met, you know, and -- you know, I

22 just feel that even though C.V., I haven't talked

23 to her, this case has been haunting me, you know.

24 I go to massive therapy for this, I'm on medication

25 because of, you know, just all of this that

1 as, oh, an enemy, I could find out stuff about

2 Lauren, and then, you know, he was in my life for

3 10 years. He helped bury my brother, you know, so

4 we fight like siblings. So when he came back

4 we fight like storings. So when he came back

5 around, you know, he -- he's not involved at all.

6 He's been living in Florida. It's just he looks

7 out for me like I'm a little sister and he

8 doesn't -- he sent me the conversation. She wrote,

9 hi, and then he wrote, who's this, and she said

10 C.V. from New York and, you know, he never answered

11 any of that when he realized it was her, but it was

12 on the day she filed the lawsuit so for me it was

13 like, hey, I'm extorting her, you know, or

14 something. She's never met him.

15 Q. And you said you're going on massive therapy

16 for this lawsuit?

17 A. I am, yes. I have a psychiatrist.

18 Q. What's your psychiatrist's name?

19 A. Wei Wang, Dr. Wei Wang, W-E-I, W-A-N-G. She

20 has me on -- it's taken months to get me on a

21 regimen and then when I was pregnant we had to

22 change it, but she has me on medication because any

23 time I would see the docket text, I would get, you

24 know, these massive anxiety attacks because from

25 day one I felt extorted. I didn't actually change

35

transpired.

Q. What's your ex-brother-in-law's name?

3 A. Jonathan Suarez.

4 Q. You said Jonathan?

5 A. Yes.

6 O. Where does he live?

7 A. He lives in Florida. He has nothing to do

8 with this.

9 Q. Do you know how C.V. got his information?

10 A. I don't. I never really -- because like I

11 said, hearing her name gives me -- my heart

12 palpitates. I don't know, and I never cared to ask

13 him. It's just, he would always say, you know, be

14 careful, be careful, and she would always try to

15 reach out to him and he just wouldn't answer.

16 Like, he texted me and said hey, what's your

17 friend, C.V.'s number, and I said my friend, C.V.,

18 because my sister-in-law's Christina and -- because

19 he didn't have her -- he didn't have her stored.

20 She would just aggressively try to reach out to

21 him, Snapchat, Instagram, just because at that time

22 when she and I got into an argument, or whatever

23 you want to call that, the threats, you know, my

24 sister had just gotten a divorce so they were not

25 on great terms. So I think that C.V. looked at it

1 my name until I was 39 weeks pregnant, because

2 she's very vindictive and I feel she waited one

3 whole year to file on me and inquiring about me to

4 people and I said I'm gonna protect my husband and

5 not change my name, and then because she waited so

6 long to file, at 39 weeks pregnant, I thought I was

7 safe because I was like, it's been months and

8 months, I haven't heard anything, and I changed my

9 name when I was 39 weeks and -- maybe I was

10 38 weeks, but I was very close to giving birth. I

11 was very fat in my photo and I'll never forget, I

12 waited that long and then she filed, so someone

13 must have tipped her off that I changed my name,

14 but I waited that long to protect my husband

15 because I knew that she kept saying to all these

16 friends, you know, to Nicoletta and to Olivia, that

17 if you don't send me, your names are gonna be

18 listed in a document that's gonna be on the

19 internet and it's gonna be -- everyone on Google is

20 gonna see it, and because she and I were not on

21 speaking terms, she hit Olivia with an NDA, she

22 tried to hit Nicoletta with one but Nicoletta never

23 signed one, about her husband, I assume, and I just

24 believe I was extorted ever since. I genuinely

25 believe that. I believe that it was -- it was all

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